

Troy Judd, President
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ALECA

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ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION

Fort Mojave Telecommunications • Frontier Communications • Gila River Telecommunications • Hopi Telecommunications • Midvale Telephone Exchange • San Carlos Apache Telecommunications Utility • South Central Communications • Table Top Telephone Company • TDS • Tohono O'odham Utility Authority • Valley Telephone Cooperative • Zona Communications

August 24, 2011

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket Nos. 10-90, 07-135, 05-337 and 03-109, GN Docket No. 09-51 and CC Docket Nos. 01-92 and 96-45; Connect America Fund, a National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-up

Dear Ms. Dortch:

The Arizona Local Exchange Carrier Association (ALECA) writes in support of the complementary Universal Service Fund/Intercarrier Compensation/Connect America Fund reform proposals offered by the rural rate-of-return incumbent local exchange carriers (RLECs)¹ and the large and mid-size ILECs² (collectively, the "Consensus Framework"). The Consensus Framework incorporates a balance of mechanisms intended to enable adequate cost recovery while enabling the deployment and maintenance of broadband and broadband-capable networks. The complementary proposals include cost recovery mechanisms that are aligned with the Commission's interest in constraining growth of high-cost support funds. In this regard, ALECA urges the Commission to refrain from modifying elements of the Consensus Framework, including, but not limited to, reductions in the amount of support; the imposition of any hard cap on high-cost support; or adjustments that would affect adversely RLEC's/ILEC's ability to obtain compensatory resources from an intercarrier compensation restructuring mechanism. The carefully crafted compromises were tuned to meet specific objectives that enable adequate cost and revenue recovery and encourage regulatory certainty while ensuring broadband for rural America. Adjustments to the Consensus Framework that affect those interests adversely could undermine the overall effectiveness of the Consensus Framework, thereby eliminating not only industry confidence in an acceptable reform solution, but also investor confidence that enables the injection of necessary private capital to support networks where no business case can be made.

¹ Comments of National Telecommunications Cooperative Association (NTCA), the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), and the Western Telecommunications Alliance (WTA), WC Dkt Nos. 10-90, 07-135, 05-337, 03-109, GN Dkt. No. 09-51, CC Dkt. Nos. 01-92, 96-45 (filed Apr. 18, 2011) as modified by the groups' filing in the same dockets on July 29, 2011

² Letter from AT&T, CenturyLink, FairPoint Communications, Frontier, Verizon and Windstream, to Julius Genachowski, Chairman, FCC, *et al.*, WC Dkt. 10-90, *et al.* (filed July 29, 2011).

The ALECA members recommending this Consensus Framework are:

- Fort Mojave Telecommunications
- Frontier Communications
- Hopi Telecommunications
- Midvale Telephone Exchange
- San Carlos Apache Telecommunications Utility
- South Central Communications
- Table Top Telephone Company
- TDS
- Tohono O'odham Utility Authority
- Valley Telephone Cooperative
- Zona Communications

ALECA members are committed to serving rural areas and the Consensus Framework facilitates our ability to do so. ALECA therefore urges the Commission to adopt and implement the Consensus Framework without modification.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. Judd", is written over a stylized line that resembles a checkmark or a signature flourish.

Troy Judd
President
Arizona Local Exchange Carrier Association